CITY OF

PORTLAND, OREGON

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To: Environmental Protection Agency District 10 leaders   9/8/16

From: Commissioner Amanda Fritz, RN, MA (Cantab)

Thank you for circulating the Proposed Draft Record of Decision on the Portland Harbor Superfund Cleanup strategy. I appreciate the community outreach and agency discussions that led to the Record of Decision proposal.

While I recognize the balanced consideration of interests that led to Commissioner Nick Fish and Mayor Charlie Hales submitting their response on behalf of the City of Portland, I respectfully disagree with their conclusions. I concur that Portlanders need and want a plan to clean up the Superfund site that can be implemented quickly without excessive court battles. I believe the EPA proposal falls short of our shared goals for a clean, healthy working river. More action is needed, holding all potentially responsible parties accountable.

Portlanders want clean rivers as soon as practicable, not decades of monitoring. At the public forum I attended, many neighbors requested more active mitigation, rather than leaving over 1,000 acres relying on "monitored natural recovery". I support the recommendations of the Portland Harbor Citizen Advisory Group, whose members have diligently provided expert input on the process and proposed plan.

The plan proposed by EPA will leave the Willamette River highly contaminated for decades. It does not meet either the interim or long-term goals that the EPA set for the clean-up. It provides no certainty on a deadline when fish consumption advisories will be lifted. We should not only provide "a fish for each hungry family", or even "teach a family where to fish". We should ensure that all fish in the Willamette are healthy to eat every day of the year, and that each fish is healthy in contributing to historic reproduction levels.
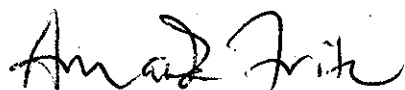
The EPA draft Record of Decision relies too much on monitored natural recovery. Leaving the contamination in place, and hoping the river either covers it up with new sediment or flushes it into the Columbia is not reasonable, given the levels of contamination in 86% of the 2,200 acre site. Natural recovery has not worked over the decades since the toxins were likely deposited. My English grandfather worked to ship recycled metals for ship-building to the US in WW2. I appreciate that the US military focused on saving the free world during what my parents called "The War". It's now my generation's turn, to pay back the debts from that struggle. I believe that means cleaning up the Portland Harbor so that nobody worries about wading on the shore or eating the fish.

The EPA draft Record of Decision relies on signage warning people that the river is not safe for humans or fish. Signs have been in place since the harbor was listed in 2000. These signs have proven ineffective at stopping people from accessing contaminated areas and eating contaminated fish. There is no reason to think they will be more effective in the future. Hungry people will eat the fish if they cannot afford to buy healthy food, so the plan disproportionally impacts less affluent neighbors.

I support Alternative G, which is the only alternative that can feasibly achieve the clean-up goals EPA set for this process. In addition, I request EPA to augment Alternative G by requiring more dredging in areas of high human use, high wildlife value, and along the river banks. I also ask EPA to ensure that dredging is performed in areas of erosion, where contamination would continually be exposed and re-exposed.

We are Portland. We can do better. I ask EPA to strive for outcomes related to the Willamette River Superfund cleanup that will make the future safer for all Portlanders, including the fish that live or pass through our city. Thank you for your consideration of my comments, sent from an individual who has been highly involved in pursuing clean, healthy working rivers in Portland for over 20 years.

Respectfully submitted,

Amanda Fritz